

ORIGINAL

Miss Crystal Bitton a.k.a. Ms. Saphyre Redford
 Miss Daniel Bitton a.k.a. Miss Danielle Bitton
 Church Street Station P081008
 NY, NY 10008
 (347) 724-3786
 (347) 392-8622

18CV2394 LDH-LB

c/o Ms. MacVaens, Rachael
 Court of Appeals
 26 Eagle Street
 Albany, NY

USED NY
 225 E. Cadman Plaza East
 Bklyn, NY

25 April 2018

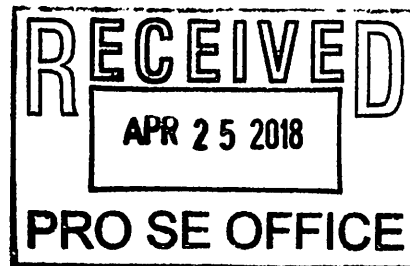
Dear Ms. MacVaens, Rachael Honorable Clerk of Court,

Today on 25 April 2018, I spoke with Clerk of Court, Ms. Mary Rauls for the Eleventh Circuit Miami-Dade County, Florida, approximately 12:00pm. Asking the Hon. Clerk Ms. Rauls why state Attorney of Florida till today has not answered ~~neither~~ my family nor I. Never was there a proper reply not from State Attorney Ms. Katherine Fernandez-Rundle nor Attorney General Ms. Pam Bondi of Florida nor Corporation Counsel NYC, Mr. Zachary Carter nor Attorney General of NY et al.

PLEASE TAKE NOTICE that as I had stated to Hon. Clerk Ms. Rauls that my case is contested till today as well for my family. That never did I nor my family wave our rights due process. My family & I had returned back to state of NY upon directions given by Homeland Security USCIS to fix error in citizenship National. Till today, we had acted in good faith. There is no waiver of rights not with state of NY, AG of Fla, et al. We contest. We wait for the Court's to reply. Produce Discovery in good faith. We never signed no waiver of rights neither to the Federal Gov nor to the States et al. Thank You.

Respectfully,
 Ms. Bitton & Ms. Bitton

Bklyn, NY
 25 April 2018
 Certificate of SVC sent to
 AG of NY 120 Broadway
 NY, NY 10273



Miss Biton, Danielle aka Miss Biton, Daniel
Church Street Station POB 1008
NY, NY 10008-1008

(347) 392-8622

Honorable Judge LaShann DeArcy Hall
Chief Honorable Prose Clerk Mr. Ralph Vega
225 Cadman Plaza East
Brooklyn, NY 11201

17-MC-803 (LDH)
17-MC-804 (LDH)

Dear Honorable Judge LaShann DeArcy Hall,

13 April 2018

On 10 April 2018, my family people and I went to USEDNY after receiving in the mail Mandate from the United States Court of Appeals for the Second Circuit Courthouse Docket Numbers, 17-2789 (L), 17-2791 (Con) in relation to good merits cases filed at Eastern District Courthouse in matters, Biton et al vs Donald Beaton Verilli et al, lower docket case numbers 17 MC 803 & 17 MC 804 DeArcy Hall, J.. PLEASE TAKE NOTICE that the Order dated 5 May 2017, as stated by your Honorable Judge DeArcy Hall, "Plaintiff Crystal Biton is not under a filing injunction and therefore has the option of filing a new in forma pauperis complaint without Danielle Biton. Your Honorable Judge DeArcy Hall, Peace to this Court and to truth. Never did I steal my mother's id nor anyone else in my family nor did I go to this Court to any other court seeking anything but truth & justice. So as I now proceed to file with United States Supreme Court stating that my family my people we peaceful people that it was FBI to United Airlines et al that stole our id in order to unjustly gain for themselves and others. Yet as the Lord loves peace, may the beautiful people from USA to Israel to Syria to China et al know truth that my family & I acted not against humanity but for humanity.

WHEREFORE, the recent good merits complaint filed by my Honorable mother Mrs. Crystal Biton aka Mrs. Saphyre Redford be heard without prejudice and with her civil rights protected in good faith.

Respectfully,

Miss Biton
9 VICTIMS NO MORE (MOORE)
I LUVE THE KING OF MOROCCO FILMS
24 NORTH MOORE STREET FILMS PRODUCTIONS

ORIGINAL



April 25, 2018

Hon. Roslynn R. Mauskopf
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *McClarence v. Int'l Union of Operating Engineers, Local 14-14B, AFL-CIO*, 16-cv-6614 (RRM) (LB)

Dear Judge Mauskopf:


I am the *pro se* Plaintiff in the above-captioned case.¹ I write to respectfully oppose the Defendant's request, filed April 13, 2018, for a pre-motion conference to move for summary judgment. *See* ECF # 14. I also request that the Court re-open discovery.

On or about March 20, I received Defendant's responses and objections to my document requests. Within two days, I called counsel for Defendant to try to negotiate for some of the documents that he had refused to provide. At that time, Defendant's counsel told me that he would not be providing any responses to my interrogatories because they were not correctly formatted. Defendant's counsel also indicated that he was not willing to provide me any additional documents absent an order from the Court.

Discovery closed shortly after, on March 30, 2018, before I was able to refine my interrogatories and document requests, attempt to negotiate further with Defendant, or move this Court to compel Defendant's production. I therefore respectfully request that the Court deny (or alternatively, stay) Defendant's request for a pre-motion conference to move for summary judgment as premature, and to re-open discovery so that I may obtain the evidence necessary to prove my case.

¹ This letter was prepared with the help of an attorney in the City Bar Justice Center's Pro Se Legal Assistance Project.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rickey McClarence". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rickey McClarence

Plaintiff, *pro se*

Cc: James Steinberg, *Attorney for Defendant* (via U.S. mail)